

Exhibit O

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ROADSYNC, INC.,)

)

Plaintiff,)

)

vs.) CASE NO. 1:21-cv-03420-MLB

)

RELAY PAYMENTS, INC.,)

SPENCER BARKOFF, JAMES)

RYAN DROEGE,)

)

Defendants.)

)

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CONFERENCE OF ATTORNEYS
Before Richard Bursky, RMR, CRR

Certified Court Reporter

Via Zoom Videoconference

On September 8, 2023, commencing at 4:35 p.m.

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1 APPEARANCES:

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For the Defendants
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1 MS. STONE: So we are willing to do this.
2 The reason, Jon -- I think you might think that
3 this is a much easier task than it is. We have
4 pulled from about 17 repositories and, as you
5 know, we have -- well, maybe it is not as you
6 know, but we have been working insanely hard to
7 get this document production out to you today.

8 So I am not here -- I don't have them. They
9 vary. It wasn't all the exact same date, because
10 depending on when we got the requests and when we
11 were having conferrals and what we were doing.

12 So it is not that we are not willing to give
13 it to you, it is just that it is taking a little
14 bit of digging to get you the dates. But you are
15 going to get the document production later today.
16 You are going to see post-complaint documents in
17 there.

18 Some of the repositories are in '21, some
19 are in '22 -- actually I don't know if any of
20 them are in '22, maybe they were, some of them
21 were in '23. The collection dates were
22 different. So we will get you that information,
23 it is just, it takes some digging to do it.

24 MR. CHALLY: That's fine. I just want to
25 know that I am going to get it and that we are

1 going to get it soon-ish, that's all. So if you
2 need next week, that's fine.

3 The Legalist agreement, you know, I've tried
4 to be up front and honest with you as to what I
5 am trying to do in asking you about it
6 immediately after the hearing, and thereafter. I
7 am trying to figure out what is most important to
8 you.

9 I've already done everything that I can do
10 to get a near fully redacted Legalist agreement
11 over to you, so I don't know that there is
12 anything further that we need to discuss on that
13 today.

14 I had hoped that we would be able to have a
15 discussion on this so as to avoid you all
16 claiming that there needs to be some additional
17 piece of information that you need to see, but we
18 haven't been able to have that discussion.

19 So what I would say to you is you are going
20 to a Legalist agreement that has very few
21 redactions. You are also going to get the two
22 NDAs that we talked about. If there is other
23 information that you feel like you need in the
24 agreement, just please tell us what that is, and
25 we are happy to try to work to facilitate it.

1 Okay?

2 On the evidentiary hearing, I don't
3 understand --

4 MR. LANDES: Wait, wait, wait, wait, wait,
5 wait, Jon. I think it would be easier to take
6 the issues individually. If you want to read
7 them all, that's fine, but it might be harder to
8 keep track.

9 MR. CHALLY: I don't know what you are
10 saying, Ryan. I am in the middle of a deposition
11 and I don't have time to go through the 15 pages
12 of the email exchanges that we have been engaged
13 in since last Friday. If that is something you
14 wanted to do, I wish that you would have picked
15 up the phone before last Friday.

16 But I have five things that I need to try to
17 address with you. If you things you want to ask
18 us, you are welcome to try to do that. I have
19 five things that I need to try to get done, so
20 that I can go back to my deposition.

21 MR. LANDES: If you just want to read
22 something that you have written, that's fine. I
23 just don't think it --

24 MR. CHALLY: I haven't written anything,
25 Ryan. I am trying to get through the issues. Is

1 there something you want to talk about as it
2 relates to the Legalist agreement?

3 MR. LANDES: Yes. You asked me a question,
4 I am happy to answer it.

5 MR. CHALLY: Go for it.

6 MR. LANDES: So we will look at what you
7 produce. The thing that we want is what RoadSync
8 agreed to produce in Ms. Park's email and in
9 Docket 132, which is something that only has
10 financial terms redacted and nothing else.

11 So if that is what you are producing, then
12 we are fine. And if not, then we will have an
13 issue.

14 MR. CHALLY: Look at what we are going to
15 produce. I don't think it needs to be debated
16 anymore.

17 It is a reasonable question to have, because
18 financial terms include when money will be paid.
19 Financial terms include budgets that they
20 request.

21 Financial terms include the amounts of money
22 that they are agreeing to fund. It includes a
23 variety of additional information.

24 So I was simply trying to get clarity on
25 that. And we unfortunately weren't able to do

1 so. So we have done the best that we can, and we
2 are happy to try to do more.

3 Once you look at what we produced, just let
4 us know if there is something else you need,
5 okay?

6 MR. LANDES: We will look at what you
7 produced today.

8 MR. CHALLY: Great.

9 I don't understand your email about the
10 evidentiary hearing. We don't need an
11 evidentiary hearing.

12 We are not going to contend that prior
13 counsel in their trade secret or their, excuse
14 me, their interrogatory responses or in the
15 motion to dismiss briefing contended that
16 features and functions were a part of this case.
17 So I am not sure why you believe that the
18 discussion was unproductive or that we weren't
19 fully addressing the question you presented to
20 us.

21 MR. LANDES: Okay, I do think that makes it
22 clearer, so I appreciate that.

23 MR. CHALLY: Okay, good. The two things
24 that I am also trying to get an answer to, Katie
25 is clarifying. So I want to be clear on this,

1 there were requests that went to features and
2 functions. There were document requests, there
3 were interrogatories that went to features and
4 functions.

5 That's why, when we say prior counsel
6 believed that the fiduciary duty claim put at
7 issue, features and functions, that's why those
8 requests were written as they were. Even the
9 language that you quote in your email last night
10 reflects that features and functions were part of
11 the information, the confidential information
12 that we allege that Droege and Barkoff took
13 improperly in breach of their fiduciary duty.

14 So we are not going to claim that it was a
15 part of the trade secret contention previously.
16 We will, of course, claim that it was part of the
17 trade secret disclosure that was provided after
18 we got in the case. But we are not going to
19 claim that features and functions were part of
20 the trade secret claim prior to that time.

21 MR. LANDES: Now, that's a little different
22 from what you said before. What I am trying to
23 understand, we are going to file a motion to
24 strike features and functions, among other
25 things, from the latest trade secret ID.

1 And what I am trying to understand is
2 whether your opposition is going to say it is
3 appropriate for them to be in there because
4 features and functions were always part of this
5 case.

6 And if so, if you plan to make an argument,
7 then we need evidentiary hearing. But if all you
8 are going to say is they weren't part of the case
9 before, it was fine for us to insert them in our
10 June 23rd trade secret ID, then we don't need an
11 evidentiary hearing. I am trying to determine
12 which it is.

13 MR. CHALLY: We have answered. I am not
14 trying to be difficult, I don't know how to
15 differently answer the question.

16 We will not say that, as part of the trade
17 secret claim, prior counsel, that is RoadSync
18 prior to us, asserted in filings that features
19 and functions were part of the protected trade
20 secret that we alleged your folks
21 misappropriated. We will say that features and
22 functions were a part of the discovery that we
23 sought.

24 MR. LANDES: But my question is, are you
25 going to say that because you sought discovery on

1 features and functions earlier in the case, it
2 was appropriate for you to add them as trade
3 secrets in June?

4 MR. CHALLY: We certainly will say that we
5 sought discovery on features and functions, and
6 that features and functions were at issue in this
7 lawsuit as a result of other claims. We will say
8 that.

9 MR. LANDES: Okay. Then I think we need an
10 evidentiary hearing.

11 MR. CHALLY: That's simply -- okay, fine.
12 Fine. I think I understand why you believe it is
13 in your advantage to do so, but I don't think
14 that is at all consistent with what Judge Brown
15 suggested.

16 But I think what you should do, what we
17 should do you, you should file your motion to
18 strike. If you think you should preview that
19 motion with a notice to the Court indicating why
20 you believe an evidentiary hearing is required,
21 then we will provide a response; or if you want
22 to request that evidentiary hearing in your
23 motion, we will respond to it in the briefing.
24 That's fine too.

25 But I don't know what else to say on this

1 particular topic.

2 MR. LANDES: Okay. I think Judge Brown did
3 say that the evidentiary hearing should occur
4 before our motion, so if you could please get as
5 soon as possible availability from prior counsel
6 for an evidentiary hearing.

7 MR. CHALLY: Ryan, I don't think that you
8 are accurately recounting what Judge Brown said.
9 But if you want to seek that, I don't know how --
10 how do you then envision, we will go to Judge
11 Brown and say, please set an evidentiary hearing?

12 MR. LANDES: That's now we would do it. We
13 would say, here are the dates we're available, we
14 would like an evidentiary hearing on this issue.

15 MR. CHALLY: We disagree that one is
16 required in light of his comments. All I am
17 saying, you file what you'd file. We will
18 respond appropriately.

19 And if the Court indicates that an
20 evidentiary hearing is required, then of course
21 we will provide dates.

22 MR. LANDES: All right. So at this point,
23 you are not agreeing to make prior counsel
24 available for an evidentiary hearing and we will
25 need a Court order to get that?

1 That was a question.

2 MR. CHALLY: I am aware.

3 Yes, so I don't have dates. I am very
4 surprised that you are contending that an
5 evidentiary hearing is required in light of our
6 concession, as we are giving to you, that this
7 was not part of the trade secret claim
8 previously. I am very surprised. Perhaps I
9 shouldn't be, but I am.

10 So if you are going to maintain the position
11 that an evidentiary hearing is required because,
12 for instance, features and functions were part of
13 the discovery record in this case previously or
14 part of other claims that were not required to be
15 addressed in the trade secret disclosure, then I
16 suppose I need to go back to prior counsel and
17 have this discussion.

18 MR. LANDES: Have what discussion?

19 MR. CHALLY: As to when they are available
20 or as to whether we will try to avoid the
21 necessity of an evidentiary hearing with lawyers
22 on the stand.

23 MR. LANDES: Okay. Can you get back to us
24 next week? Our filing is due on --

25 MR. CHALLY: Sure can, next week.

1 MR. LANDES: I think it is due on Tuesday,
2 so can you get back us to us on Monday?

3 MR. CHALLY: Yes.

4 MR. LANDES: Thank you.

5 MR. CHALLY: Anything else on that?

6 MR. LANDES: No, no.

7 MR. CHALLY: I am trying to understand in
8 general terms what you are doing to either
9 identify materials that are within the production
10 that you are planning to make today, or narrow or
11 limit in any way your search for those materials,
12 based on either your objections or your
13 contention that you are only going to provide
14 responsive material. I am just looking for a
15 general sense of that. Can somebody give that to
16 me?

17 MS. STONE: I guess I am just a little
18 confused about the request, honestly, because it
19 seems to be a request of what is a responsiveness
20 review, which I know everybody on this call knows
21 what that is.

22 What I can tell you is that we ran the
23 search terms, as Ryan laid out in his email from
24 earlier this week or last week, across the
25 documents that we collected for the various

1 periods. We have had people reviewing, attorneys
2 reviewing. I have personally reviewed thousands
3 of documents over the last few days.

4 We have all of the discovery requests. We
5 are looking at the requests and saying, is this
6 responsive to the requests; is it not. If it is,
7 we are producing it. If it is not and it is not
8 privileged, we are producing it, and it doesn't
9 fall within one of the other kind of weird
10 examples that we talked about, that we have given
11 you several examples of, we are producing it.

12 Anything, we are taking a very broad
13 approach to production and to responsiveness.
14 And we are giving you everything and more than
15 you want, I think.

16 We are giving you what you say you want, but
17 it might actually be more than what you want.
18 But we are reviewing documents. So that's what
19 we are doing, we are doing a responsiveness
20 review.

21 MR. CHALLY: I guess this issue really
22 arises, Julia, for two reasons. I very much
23 disagree with the contention that it is only
24 appropriate to do a responsiveness review. That
25 doesn't so much apply to you as it does to the

1 complaints that you have as to the process that
2 we followed.

3 The issue is more significant, what is a
4 responsiveness review. That's more significant,
5 because we did not understand until we met on
6 July 5 at your office that you guys in the prior
7 responsiveness review you were doing had used
8 that 16 key customer limitation. And I learned
9 that then.

10 And for other aspects of your objections,
11 they aren't nearly as clear as even that key
12 customer limitation. And so if there is no other
13 sort of categorical limitation, that's fine.

14 What I don't think is sort of possible to do
15 is for someone to see a document that says
16 RoadSync and then for them to separately refer to
17 all of our requests and all of your objections
18 and determine whether or not it fits within
19 whatever the area of kind of allowed production
20 to be.

21 I just don't think that's likely what's
22 going on. If you are representing to me that's
23 what in fact you are doing with all of those
24 requests, then okay.

25 But then it comes back to, is there some

1 sort of categorical limitation that you are
2 implying because of, for instance, an objection
3 that it is unduly burdensome or broad or
4 something to that effect, something that might be
5 considered a generic or boilerplate objection.

6 MS. STONE: A couple of things about that.
7 I understand your position that you didn't know
8 about the 16 customer limitation until -- hang
9 on, excuse me just one second.

10 MR. CHALLY: You're fine.

11 (Pause.)

12 MS. STONE: So you know, I understand your
13 position that you didn't know about the 16
14 customer. We think we could not have been
15 clearer about that, and all of the various
16 correspondence and in our RNOs, but I am not here
17 to retread that ground.

18 We are literally going document by document
19 and looking at the requests. So, you know, there
20 are documents and I think Ryan mentioned some of
21 these at the Court hearing last week, that hit on
22 the term RoadSync because it was a document that
23 was sent from a doctor to Ryan Droege both to his
24 gmail and to his RoadSync email address that has
25 absolutely nothing do with anything. That is not

1 being produced. It is not responsive to any
2 request, just because it hits on the term
3 RoadSync.

4 If it is about the company RoadSync, we are
5 producing that, if it is a communication about
6 it. So I mean, again, you are going to get our
7 production later today.

8 I feel very confident that we have gone
9 above and beyond in what we are producing to you.
10 So, you know, we literally do have spreadsheets
11 of all of the requests to go through and to look
12 at what has to be produced, and a lot of the
13 requests are incredibly broad and we are
14 producing. So we are reviewing the documents.

15 MR. CHALLY: So I mean, I appreciate that.
16 That's kind of what I was just trying to get a
17 sense of for the last few days.

18 I think what, just let me give you a
19 hypothetical. So let's say it is an internal
20 discussion that mentions a RoadSync funding
21 round. Is that something that you would consider
22 to be responsive or not?

23 MS. STONE: I have not seen a document like
24 that, but if I did see a document like that, I
25 would mark it for production.

1 MR. CHALLY: And if it is a document that is
2 a communication related to what RoadSync may be
3 doing in the market, whether that be something
4 that's publicly known or something that folks at
5 Relay learned from connections they have to
6 RoadSync, is that something that you would think
7 would be produced?

8 MS. STONE: Yes.

9 MR. CHALLY: I am just trying to get a
10 sense.

11 MS. STONE: Yes, so again, I don't want it
12 to be to become an issue when you don't see those
13 documents because I haven't seen those documents.
14 But if I saw those documents, that would be
15 produced.

16 So I don't want you to think that the lack
17 of those documents means we are withholding it.
18 We are not. But, yes, that type of stuff would
19 be produced if it existed.

20 MR. CHALLY: Fair enough. And then as it
21 relates to like substitute RoadSync there for
22 Robin, correct, assuming such, those kind of
23 documents exist, are those the kind of things
24 that you would think would be responsive to the
25 requests that be produced?

1 MS. STONE: Yes. Again, I don't think
2 those, at least in the -- I haven't reviewed
3 every single document that's being produced,
4 there have been a lot of attorneys working, but
5 from what I have seen, I don't think that that
6 exists, but if it does, that is getting produced.

7 MR. CHALLY: Okay. We will take a look. I
8 am just trying to get a sense for that. I
9 appreciate you giving me that. That's helpful.

10 That's all the questions that I have. We
11 will look for the collection dates when you are
12 able to send them, Julia.

13 And we will get back to you on Monday about
14 the evidentiary hearing thing. You guys can look
15 at what we make available to you and go from
16 there.

17 MS. STONE: So I had one other thing to talk
18 about, and I don't know if Ryan has anything
19 else. Deposition dates, we have gotten dates
20 from our clients. They don't have a lot of
21 availability, but Ryan can be available on the
22 22nd and then having the 30(b)(6) on the 25th and
23 Spencer can be available on the 27th.

24 So just let us know about that. But we
25 would like to get their schedules and everybody

1 locked down and trying to give you all enough
2 time to review what we are about to produce.

3 MR. CHALLY: You said the 22nd, the 25th and
4 then what?

5 MS. STONE: The 27th.

6 MR. CHALLY: Okay. I know Josh and Katie
7 have a hearing on the 25th, so we just will need
8 to juggle a little bit, but why don't you let us
9 talk about it and we will try to make those dates
10 work.

11 MS. STONE: Thank you.

12 MR. CHALLY: So you are going to get a
13 privilege log; you are going to get from
14 Downgrade Productions today. We also, as we told
15 you all, went about trying to go through the
16 confidentiality designations again and you are
17 going to get that as well.

18 Our vendor told us a little while ago that
19 that might be early in the morning before that
20 overlay production is complete for the
21 confidentiality designations. But you will get
22 that just as soon as we can transmit it to you.

23 The rest of the stuff you should have at
24 some point either from Bryan or from the vendor
25 directly this evening.

1 MR. LANDES: Jon, the other issue is, do you
2 have any sense of when you will be able to
3 approve filing of the sanctions motion?

4 MR. CHALLY: You said Monday, right?

5 MR. LANDES: Right, that's what we asked
6 for. Are you going to be able to provide
7 approval by then?

8 MR. CHALLY: To be honest with you, I think
9 -- well, yes, we will give you a substantially
10 revised portion in light of the developments that
11 have occurred since the time we last dealt with
12 it. We will give that to you on Monday and you
13 are welcome to do with it what you like.

14 MR. LANDES: Okay. And that one will have
15 your approval to file that version --

16 MR. CHALLY: Yes.

17 MR. LANDES: -- when you send it?

18 MR. CHALLY: Yes.

19 MR. LANDES: Thank you. Okay I don't think
20 we have anything else.

21
22 (Time noted: 4:57 p.m.)
23
24
25

D I S C L O S U R E

I, Richard Bursky, CCR, do hereby disclose pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that I am a Georgia CCR; Veritext Legal Solutions was contacted by the party taking the deposition to provide court reporting services for this deposition; this deposition will not be taken under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b); and I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c).

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Richard Bursky CCR

Veritext Legal Solutions

CERTIFICATE OF COURT REPORTER

STATE OF GEORGIA)

COUNTY OF HENRY)

I hereby certify that the foregoing proceeding was reported as stated in the caption, by the method of Machine Shorthand, and the proceeding thereto was reduced to typewriting by me; and that the foregoing pages represent a true, correct, and complete transcript of the proceeding occurring on September 8, 2023.

This the 11th day of September, 2023.



Richard Bursky, CCR
Certified Court Reporter
Certificate # 2509

[& - available]

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